
From: Phipps, Kelly E. (CIV) <Kelly.E.Phipps@usdoj.gov>
Sent: Friday, October 9, 2020 12:57 PM
To: Singer, Linda
Cc: 'Track2OpioidDefendants@reedsmith.com'; Paul Farrell Jr; Kears, Anne; Deyneka, Natalie; Sobotkin, David M. (CIV); Hoerner, Jonathan K. (CIV); Westfall, Fred (USAWVS)
Subject: RE: EXTERNAL-RE: 20200925 LSinger Letter to DOJ

Counsel,

The DEA has reviewed Plaintiffs' September 25 letter requesting additional information from DEA beyond that provided by the DEA's 30(b)(6) witness, Tom Prevoznik, during his three-day deposition in the MDL. As the DOJ stated when it met and conferred with both parties on October 2, Discovery in MDL Track Two is closed, and Mr. Prevoznik's deposition testimony speaks for itself. Accordingly, the DEA declines to provide the requested information at this time.

Regards,

Kelly Phipps
Trial Attorney
U.S. Department of Justice, Civil Division
Commercial Litigation Branch, Fraud Section
Three Constitution Square
175 N Street, NE Room 9.1817
Washington, DC 20002
tel. 202.353.1284
kelly.e.phipps@usdoj.gov

From: Singer, Linda <lsinger@motleyrice.com>
Sent: Friday, October 09, 2020 9:24 AM
To: Phipps, Kelly E. (CIV) <khipps@CIV.USDOJ.GOV>
Cc: 'Track2OpioidDefendants@reedsmith.com' <Track2OpioidDefendants@reedsmith.com>; Paul Farrell Jr <paul@farrell.law>; Kears, Anne <akearse@motleyrice.com>; Deyneka, Natalie <nDeyneka@motleyrice.com>; Sobotkin, David M. (CIV) <dsobotki@CIV.USDOJ.GOV>; Hoerner, Jonathan K. (CIV) <jhoerner@CIV.USDOJ.GOV>; Westfall, Fred (USAWVS) <FWestfall@usa.doj.gov>
Subject: RE: EXTERNAL-RE: 20200925 LSinger Letter to DOJ

Counsel,

We have not heard from the DOJ on this issue and the CT2 trial begins in 10 days. Can you please let us know when we can expect a response? Otherwise, we may need to raise this issue directly with the Court.

Thanks so much,
Linda

Linda Singer | Attorney at Law | Motley Rice LLC
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From: Phipps, Kelly E. (CIV) <Kelly.E.Phipps@usdoj.gov>

Sent: Friday, September 25, 2020 2:48 PM

To: Steele, Angelica <asteele@motleyrice.com>

Cc: 'Track2OpioidDefendants@reedsmith.com' <Track2OpioidDefendants@reedsmith.com>; Paul Farrell Jr <paul@farrell.law>; Kears, Anne <akearse@motleyrice.com>; Singer, Linda <lsinger@motleyrice.com>; Deyneka, Natalie <nDeyneka@motleyrice.com>; Sobotkin, David M. (CIV) <David.M.Sobotkin@usdoj.gov>; Hoerner, Jonathan K. (CIV) <Jonathan.K.Hoerner@usdoj.gov>; Westfall, Fred (USAWVS) <Fred.Westfall@usdoj.gov>

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Thank you for this correspondence. DOJ, on behalf of DEA, would appreciate the opportunity to meet and confer with both parties as we consider Plaintiffs' request. Would counsel for Plaintiffs and Defendants please let us know some windows of time toward the end of next week that would work for both parties?

Best,

Kelly Phipps

Trial Attorney

U.S. Department of Justice, Civil Division

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From: Steele, Angelica <asteele@motleyrice.com>

Sent: Friday, September 25, 2020 2:23 PM

To: Phipps, Kelly E. (CIV) <kphipps@CIV.USDOJ.GOV>

Cc: 'Track2OpioidDefendants@reedsmith.com' <Track2OpioidDefendants@reedsmith.com>; Paul Farrell Jr <paul@farrell.law>; Kears, Anne <akearse@motleyrice.com>; Singer, Linda <lsinger@motleyrice.com>; Deyneka, Natalie <nDeyneka@motleyrice.com>; Sobotkin, David M. (CIV) <dsobotki@CIV.USDOJ.GOV>; Hoerner, Jonathan K. (CIV) <jhoerner@CIV.USDOJ.GOV>

Subject: 20200925 LSinger Letter to DOJ

Good Afternoon,

Please see the attached correspondence on behalf of Linda Singer.

Angelica Steele | Executive Assistant | Motley Rice LLC

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